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October 23, 2024

Honorable J. Ronnie Abrams
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
October 23, 2024

Re: United States v. Brian Gutierrez et al., 1:23-mj-06442-RA
24 CR. 573 (RA)

Dear Honorable J. Ronnie Abrams:

As appointed counsel for defendant Brian Gutierrez whose sentencing hearing is scheduled before Your Honor on February 21, 2025, I write to respectfully request the modification of the defendant's bond conditions to permit the removal of his electronic monitoring device.

I have communicated with Mr. Gutierrez' pretrial services officer who has no objection to the removal of the device. The government has stated that they take no position on the defendant's request. Your Honor should know, as Mr. Gutierrez informed the Court at his change of plea hearing, Mr. Gutierrez has secured full time employment and has been compliant with pretrial services and his bond conditions for more than one full year.

Respectfully,

//s//David Jason Cohen//s//
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